

1400 Coliseum Blvd. 36110-2400 • Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 • FAX (334) 271-7950

FINDING OF NO SIGNIFICANT IMPACT

West Lawrence Water Authority
Lawrence County

SRF Project No. FS010175-01

January 26, 2021

The Alabama Department of Environmental Management has made \$1,000,000 in financial assistance available to The West Lawrence Water Authority using funds from the Drinking Water State Revolving Fund (DWSRF) loan program. In accordance with State and Federal regulations that govern the program, the Alabama Department of Environmental Management has conducted a review to assess the potential impacts upon the environment that may result from implementation of this project.

The West Lawrence Water Authority proposes a project to provide improved reliability within the distribution system. The proposed project will consist of installing a new water line from the City of Moulton Water Treatment Plant (WTP) to the West Lawrence purchase meter on Lawrence County Road 240, upgrade existing water line to the Loosier Tank, upgrade existing water line from south of the City of Moulton WTP to Lawrence County Road 460 pump station, installation of a new booster pump station and SCADA. Completion of this proposed project will provide a more reliable water service between the West Lawrence Water Authority and the City of Moulton.

The Alabama Department of Environmental Management has determined that the proposed project will not have a significant adverse impact on the environment and consequently is herewith issuing a Finding of No Significant Impact (FONSI) to support the use of DWSRF funds for the construction of the proposed project. However, this decision may be reconsidered if significant adverse information concerning the potential environmental impacts of the proposed project is discovered. Attached is an Environmental Assessment that details the proposed project and its impact upon the environment.

Comments relative to this project should be submitted in writing to Mrs. Chavon R. Jones, SRF Section, Permits & Services Division, Alabama Department of Environmental Management, P.O. Box 301463, Montgomery, Alabama 36130-1463, no later than 30 days after the date of public notice. The Alabama Department of Environmental Management will not take formal action to proceed with the project without carefully evaluating any public comments opposing the project.

Sincerely,

Lance R. LeFleur
Director

LRL/EJR/CRJ/kbh

Attachment

ENVIRONMENTAL ASSESSMENT

The West Lawrence Water Authority
Lawrence County, Alabama

SRF Project No. FS010175-01

A. Proposed Facilities and Actions

The West Lawrence Water Authority proposes a project to provide improved reliability within the distribution system. The proposed project will consist of installing a new water line from the City of Moulton Water Treatment Plant (WTP) to the West Lawrence purchase meter on Lawrence County Road 240, upgrade existing water line to Loosier Tank, upgrade existing water line from south of the City of Moulton WTP to Lawrence County Road 460 pump station, installation of a new booster pump station and SCADA. Completion of this proposed project will provide a more reliable water service between the West Lawrence Water Authority and the City of Moulton.

B. Existing Environment

The West Lawrence Water Authority is located in the northwest corner of Alabama in a town called Mt. Hope. Mt. Hope is an unincorporated community in Lawrence County, Alabama and is approximately 69 miles east of the Alabama/Mississippi State line, and approximately 138 miles west of the Alabama/Georgia State line. Furthermore, it is located approximately 50 miles directly south of the Alabama/Tennessee State line, and approximately 278 miles directly north of the Alabama/Florida State line and 57 miles southwest of Huntsville, Alabama and 110 miles northwest of Birmingham, Alabama.

C. Existing Water Facilities/System

The West Lawrence Water Authority serves approximately 4,900 metered customers in Lawrence County, Alabama. West Lawrence water system includes two (2) ground storage tanks with a combined total storage of 1,300,000 gallons, two (2) elevated storage tanks with a combined total storage of 1,150,000 gallons, five (5) booster pump stations with a combined pumping capacity of 2,575 gallons per minute and a distribution system with approximately 651 miles of water main. West Lawrence purchases water from the West Morgan-East Lawrence Water Authority, Russellville Water Works, and Moulton Water Works Board; and sells water to the Spring Valley Water Authority and the Colbert County Rural Water System. Overall the West Lawrence Water Authority is in compliance with the regulations of the Alabama Department of Environmental Management.

D. Need for Proposed Facilities/System Improvements

West Lawrence Water seeks to purchase more water from City of Moulton. Up until the late 1990s when West Lawrence began purchasing water from West Morgan Water, Moulton had provided 90% of West Lawrence's water through five (5) purchase meters located on the Moulton distribution system. After modifying the hydraulics of their distribution system and valving off two Moulton purchase meters, West Lawrence fed the northern portion of their system from West Morgan and reduced the amount of water being purchased from Moulton. The northern most purchase meter located on Lawrence County Road 240 was valved off to allow Moulton to direct more water toward the downtown and industrial park areas. A second purchase meter valved off is located on Lawrence County Road 33. Closure of these two purchase meters creates a water model where purchase from Moulton is only being made at the middle and southern end of the water system in two locations to provide water to West Lawrence. West Lawrence currently purchases 30 million gallons per month from Moulton in the southern portion of Moulton's system, but West Lawrence Water needs more water in the

southern portion of their system. West Lawrence also seeks water service in the northern portion of the system at the Loosier Tank.

There is another West Lawrence purchase meter located on the southern boundary of the Moulton distribution system on Lawrence County Road 59. The deficiencies mentioned above limit the full potential of water reaching this purchase meter and being passed to West Lawrence's south-east distribution system. The hydraulic model of the water routed to the purchase meter locations must be revised. Water usage has increased since the 1990s and the system piping infrastructure and purchase meter locations need to be updated in order to provide both Moulton and West Lawrence's customer base with the current water demand. To accomplish this, water must be sold at more locations, as it was in the past and upgrade distribution lines.

E. Alternatives Analysis

Transmission Main Replacement (Alternatives)

No Action Alternative

Moulton would not be capable of supplying additional flow to the system and West Lawrence Water would not have enough water for existing customers. Therefore, this option was not selected.

Alternative #1 – Installation of HDPE transmission mains

Installation of HDPE distribution pipe is an alternative. However, assuming all other requirements are the same between HDPE and ductile iron, HDPE would require the purchase of large diameter fusing equipment and generator to operate the equipment. Use of HDPE requires specialized training for employees contributing increased costs. HDPE is currently not used in the West Lawrence Water distribution system and would require stocking of HDPE for use when needed. West Lawrence Water already has ductile iron in use in the distribution system and has both the equipment to maintain the pipe and staff are already trained in the use of the material.

Presently, the cost of HDPE is approximately \$3.50 to \$5.00 per foot less than that of ductile iron however this is based on a seven-day cost proposal received from local supply houses. The cost of HDPE is closely tied to oil prices due to the petroleum by-products used in production of HDPE pipe, and any increase in petroleum production, caused by changes in supply or natural weather events, can drastically change that cost creating swings that affect the overall budget of the system. With multiple ductile iron production facilities located in the State of Alabama, ductile iron pipe can be a more reliably sourced product for years to come.

This alternative was not chosen because of the cost's initial difference.

Alternative #2 – PVC Pipe

PVC Pipe like ductile is used in the West Lawrence distribution system, however PVC like HDPE is closely tied to petroleum production. PVC does not have the ability to resist impacts or forced point loads due to rocks against the PVC pipe walls like ductile pipes. Bedrock is found in most areas of the system and placement of PVC pipe in these areas has demonstrated an increase of pipe breaks in the Moulton system above that of ductile iron pipe. PVC bends are not preferred in distribution mains due to pressure issues and water hammer that can cause increased pressure points at these locations. Typically, ductile iron fittings are used with the installation of PVC transmission pipe at directional changes rather than PVC fittings. Changes

in the materials used requires the use of special adapter fittings increasing the cost of using PVC pipe.

Based on reliability, accessibility of materials, fluctuation in market pricing, and the need for specialized fittings, PVC pipe was not selected.

F. Environmental Justice

As defined by the Environmental Protection Agency (EPA), environmental justice is the fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations and policies. Fair treatment means that no group of people, including a racial, ethnic, or socioeconomic group should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies.

Presidential Executive Order 12898, "General Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing the disproportionately high and/or adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities.

The Environmental Justice map for the proposed project revealed that low income EJ populations are located in close proximity to the proposed project area. The proposed water system improvements will benefit all areas serviced by the water system. Upgrading the water system infrastructure will provide safe, sustainable drinking water for all areas of the community.

G. Environmental Consequences; Mitigating Measures

The proposed project activities represent no overall or lasting adverse environmental impact except as normally and minimally associated with construction activities. Some short-term effects including increased noise levels, dust, exhaust emissions, increased stream turbidity and/or the disruption of normal traffic flow maybe of minimal impact and occur during actual construction. While all such effects cannot be totally avoided, adherence to Best Management Practices (BMPs) during the course of the project will significantly minimize such conditions. Traffic disruptions will be greatly lessened by conformance to an approved traffic maintenance plan.

Endangered Species and Critical Habitat

Project review and concurrence was requested from the U.S. Fish and Wildlife (F&W) Service. The U.S. Fish and Wildlife Service provided a letter of concurrence. The letter stated, "*No federally listed species/critical habitat are known to occur in the project area. As described, the project will have no significant impact on fish and wildlife resources.*"

Historical and Archaeological

Review of proposed project work by the Alabama Historical Commission found no potential adverse impact of cultural resources. Project approval was granted upon the condition that the location, scope, and nature of construction activities remain as originally presented and occur within existing highway right-of-ways or previously disturbed areas. Should artifacts or archaeological features be encountered during execution of project activities, work should cease, and the Alabama Historical Commission should be contacted immediately.

Wetlands and Floodplains

The Department of the Army Corps of Engineers (COE) was solicited for comment and concurrence of proposed project work. The U.S. Army Corps of Engineers provided a letter of concurrence. The letter stated, *“We have no objections to the applicant receiving grant funds, provided the applicant applies for and obtains any required permits prior to any disturbance to streams and/or wetlands that may occur during project construction. The applicant may apply at any time.”*

Project concurrence dated August 10, 2020, was also received from North Central Alabama Regional Council of Governments (NARCOG). The letter stated, *“NARCOG has reviewed the information and maps supplied and we offer our concurrence for this project.”*

Project concurrence dated August 18, 2020, was also received from the Tennessee Valley Authority (TVA). The letter stated, *“It appears that no TVA property is being requested for the project. Activities that do not create new or additional obstruction would not require approval under Section 26a of the TVA Act.”*

H. Public Participation: Sources Consulted

A Public Meeting was held at 5:00 p.m. on Monday, July 20, 2020, at the Moulton City Hall located at 720 Seminary Street, Moulton, Alabama. The meeting provided information and an open discussion to receive comments and concerns related to the proposed project and justification of improvements proposed for funding by the DWSRF loan. No objections or comments were expressed.

Sources to be consulted about this project for information or concurrence include the following:

Alabama Department of:

- Agriculture and Industries
- Conservation and Natural Resources
- Economic and Community Affairs (ADECA)
- Public Health

- State Soil and Water Conservation
- Alabama Forestry Commission
- Alabama Historical Commission
- US Army Corps of Engineers
- Department of Interior – Fish and Wildlife Service
- US Environmental Protection Agency
- Lawrence County Health Department



ALABAMA HISTORICAL COMMISSION

468 South Perry Street
P.O. Box 300900
Montgomery, Alabama 36130-0900
334-242-3184 / Fax: 334-240-3477

Lisa D. Jones
Executive Director
State Historic Preservation Officer

September 2, 2020

Wendy Delinski
105 W. 2nd Street
Tuscumbia, AL 35674

Re: AHC 20-1158
West Lawrence Water System Improvements
Lawrence County

Dear Ms. Delinski:

We concur with the above referenced project provided all construction activities will occur within **existing and previously disturbed** highway right-of-way and/or other previously disturbed areas. For the purposes of this letter, previous disturbance is defined as mechanical disturbance to either culturally sterile subsoil, or the maximum depth of the proposed undertaking. It should be noted that agricultural plowing does not typically meet this threshold of disturbance, nor do previously undisturbed portions of the ROW that require clearing of additional vegetation. Any area that is to be involved and does not fall into one of the above categories will require a cultural resource assessment by a professional archaeologist. Submit the resulting report to our office for review and determination prior to project initiation.

Consultation with the State Historic Preservation Office does not constitute consultation with Tribal Historic Preservation Offices, other Native American tribes, local governments, or the public. If archaeological materials are encountered during construction, the procedures codified at 36 CFR 800.13(b) will apply. Archaeological materials consist of any items, fifty years old or older, which were made or used by man. These items include but are not limited to, stone projectile points (arrowheads), ceramic sherds, bricks, worked wood, bone and stone, metal, and glass objects. The federal agency or the applicant receiving federal assistance should contact our office immediately. If human remains are encountered, the provisions of the Alabama Burial Act (*Code of Alabama* 1975, §13A-7-23.1, as amended; Alabama Historical Commission Administrative Code Chapter 460-X-10 Burials) should be followed. This stipulation shall be placed on the construction plans to ensure contractors are aware of it.

We appreciate your commitment to helping us preserve Alabama's historic archaeological and architectural resources. Should you have any questions, please contact Amanda McBride at 334.230.2692 or Amanda.McBride@ahc.alabama.gov. Have the AHC tracking number referenced above available and include it with any future correspondence.

Sincerely,

A handwritten signature in blue ink that reads "Lee Anne Wofford".

Lee Anne Wofford
Deputy State Historic Preservation Officer

LAW/AMH/nw



DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, NASHVILLE DISTRICT
WESTERN REGULATORY FIELD OFFICE
2424 DANVILLE ROAD SW
SUITE N
DECATUR AL 35603

September 18, 2020

SUBJECT: File No. LRN-2020-00904; West Lawrence Water Authority DWSRF Project; Tennessee Rive Mile 272.0 Left Bank, Franklin and Lawrence Counties, Alabama.

Bartley Taft
The Kelley Group
P.O. Box 45
Tuscumbia, Alabama 35674

Dear Mr. Taft:

This is in response to your July 23, 2020, request for our comments regarding the subject project.

The U.S. Army Corps of Engineers (USACE) has regulatory responsibilities pursuant to Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. 403) and Section 404 of the Clean Water Act (33 U.S.C. 1344). Under Section 10, the USACE regulates all work in, or affecting, navigable waters of the U.S. Under Section 404, the USACE regulates the discharge of dredged and/or fill material into waters of the U.S. (33 CFR Part 328).

A review of the information provided indicates the subject activity may involve work in wetlands/waters of the U.S.; therefore, a Department of the Army permit may be required.

We understand the project proposal may not have specific design plans at this time, and this inquiry is an initial review to obtain grant funds. We have no objections to the applicant receiving grant funds for the proposal.

If you have questions regarding this matter, please contact Eric Sinclair at the above address or telephone (256) 350-5620. Thank you for the opportunity to review and comment on this proposed project.

Sincerely,

A handwritten signature in blue ink that reads "Eric Sinclair".

William E Sinclair
Regulatory Project Manager
Regulatory Division
U.S. Army Corps of Engineers



TA/SH
2020-TA-1355

RECEIVED
AUG 10 2020
BY:.....*[Signature]*.....

THE KELLEY GROUP

P.O. Box 45
Tuscumbia, AL 35674
www.kelleynetwork.com
P: 256.248.7030 • F: 1.866.225.7488

July 23, 2020

William J. Pearson
U.S. Fish and Wildlife
1208-B Main Street
Daphne, Alabama 36526
VIA EMAIL bill_pearson@fws.gov

RE: West Lawrence Water Authority – DWSRF Project – Request for Concurrence

Dear Mr. Pearson:

The West Lawrence Water Authority seeks to make improvements to its water system and is seeking Drinking Water State Revolving Fund (DWSRF) assistance from the Alabama Department of Environmental Management (ADEM). We respectfully request your agency's review of this project for concurrence.

The West Lawrence Water Authority will improve the water system by upgrading and constructing new water lines and booster pump station.

Maps of the proposed improvements are attached for your review.

All work will be located within previously disturbed areas within existing water lines. Project footprint is located within existing Alabama Department of Transportation right-of-way, Lawrence County right-of-way and existing West Lawrence Water Authority right-of-way and property holdings.

After review, feel free to email the letter of concurrence to kelley@kelleynetwork.com.

Thank you for your time and consideration of this project.

Respectfully submitted,

[Signature: BT]

Bartley W. Taft, P.E.

Attachments



U.S. Fish and Wildlife Service
1208-B Main Street – Daphne, Alabama 36526
Phone: 251-441-5181 Fax: 251-441-6222

No federally listed species/critical habitat are known to occur in the project area. As described, the project will have no significant impact on fish and wildlife resources. IF PROJECT DESIGN CHANGES ARE MADE, PLEASE SUBMIT NEW PLANS FOR REVIEW. We recommend use of best management practices specific to your project (See <http://www.fws.gov/daphne/section7/bmp.html>).

[Signature: William J. Pearson]

William J. Pearson, Field Supervisor

SEP 04 2020

Date

3



August 10, 2020

The Kelley Group
ATTN: Bart Taft, P.E.
P.O. Box 45
Tuscumbia, AL 35674

**RE: Letter of Concurrence
West Lawrence Water Authority - DWSRF Project
Lawrence County, Alabama**

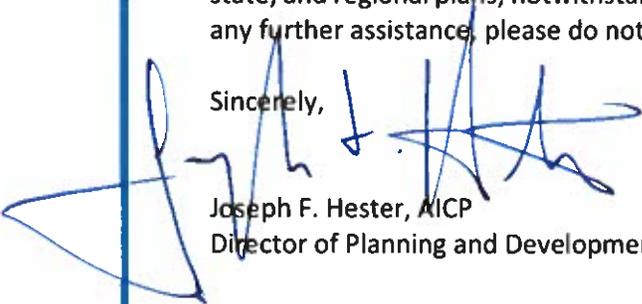
Dear Mr. Taft:

The North Central Alabama Regional Council of Governments (NARCOG) has reviewed the information and maps supplied for the proposed water system improvements project referenced above located in Lawrence County, Alabama, and we offer our concurrence for this project. NARCOG understands that the proposed project consists of:

- Upgrading and constructing new water lines and a new booster pump station

In conclusion, NARCOG finds the proposed project to be consistent and compatible with local, state, and regional plans, notwithstanding any negative environmental impacts. Should you need any further assistance, please do not hesitate to call me at (256) 355-4515.

Sincerely,



Joseph F. Hester, AICP
Director of Planning and Development

cc: Robby Cantrell, Executive Director
File



Tennessee Valley Authority, Post Office Box 1010, Muscle Shoals, Alabama 35662-1010

August 18, 2020

Mr. Bartley W. Taft, P.E.
Engineers of the South
On behalf of West Lawrence Water Authority
Post Office Box 45
Tuscumbia, Alabama 35674

Dear Mr. Taft:

WEST LAWRENCE WATER AUTHORITY DRINKING WATER STATE REVOLVING
FUND (DWSEF) APPLICATION – LAWRENCE COUNTY, ALABAMA

We have reviewed your July 23, 2020 letter notifying the Tennessee Valley Authority (TVA) of the West Lawrence Water Authority application for Drinking Water State Revolving Fund for the upgrading and constructing new water lines and booster pump station.

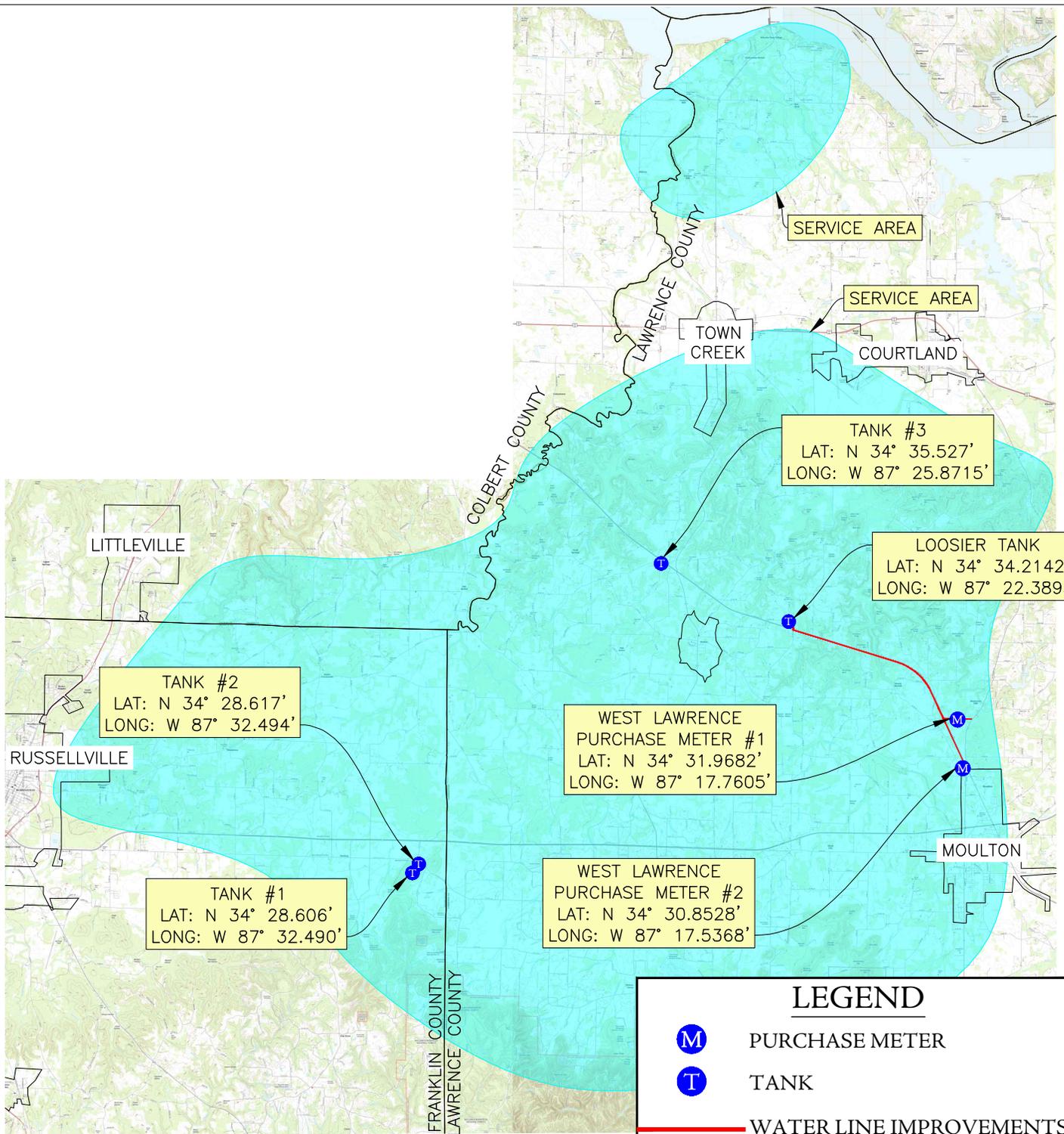
Based on the information submitted, it appears that no TVA property is being requested for the project. Activities that do not create new or additional obstruction are not new obstructions and would not require approval under Section 26a of the TVA Act. If you determine that any of the proposed activities will create a new obstruction, then the proposal would require approval from TVA. A completed application, final plans with detailed drawings, and appropriate application fee should be sent to TVA for review.

We appreciate the opportunity to work with you and look forward to working with you in the future. If you have any additional questions or concerns, please feel free to contact me by email, jkaustin@tva.gov or at (256) 386-3456.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kenley Austin'.

Kenley Austin
Program Manager
Reservoir Land Use & Permitting

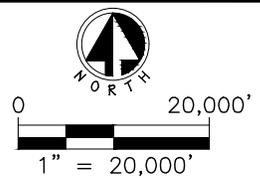


LEGEND

M PURCHASE METER

T TANK

— WATER LINE IMPROVEMENTS



USGS QUAD MAPS FOR MOULTON & MASTERSON MILL, LAWRENCE COUNTY, ALABAMA, 7.5 MINUTE SERIES, REVISED 2018. SCALED AT 1:24,000



THE KELLEY GROUP

105 W 2nd Street
Tuscumbia, Alabama 35674

Phone: 256.248.7030 Fax: 1.866.225.7488

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USGS QUAD MAP

WATER SYSTEM IMPROVEMENTS
WEST LAWRENCE WATER CO-OP
ALABAMA

PROJECT NUMBER	DATE	SHEET NUMBER
190053	7/2020	1

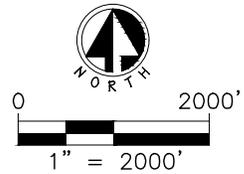


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LEGEND

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USGS QUAD MAPS FOR MOULTON & MASTERSON MILL, LAWRENCE COUNTY, ALABAMA, 7.5 MINUTE SERIES, REVISED 2018. SCALED AT 1:24,000

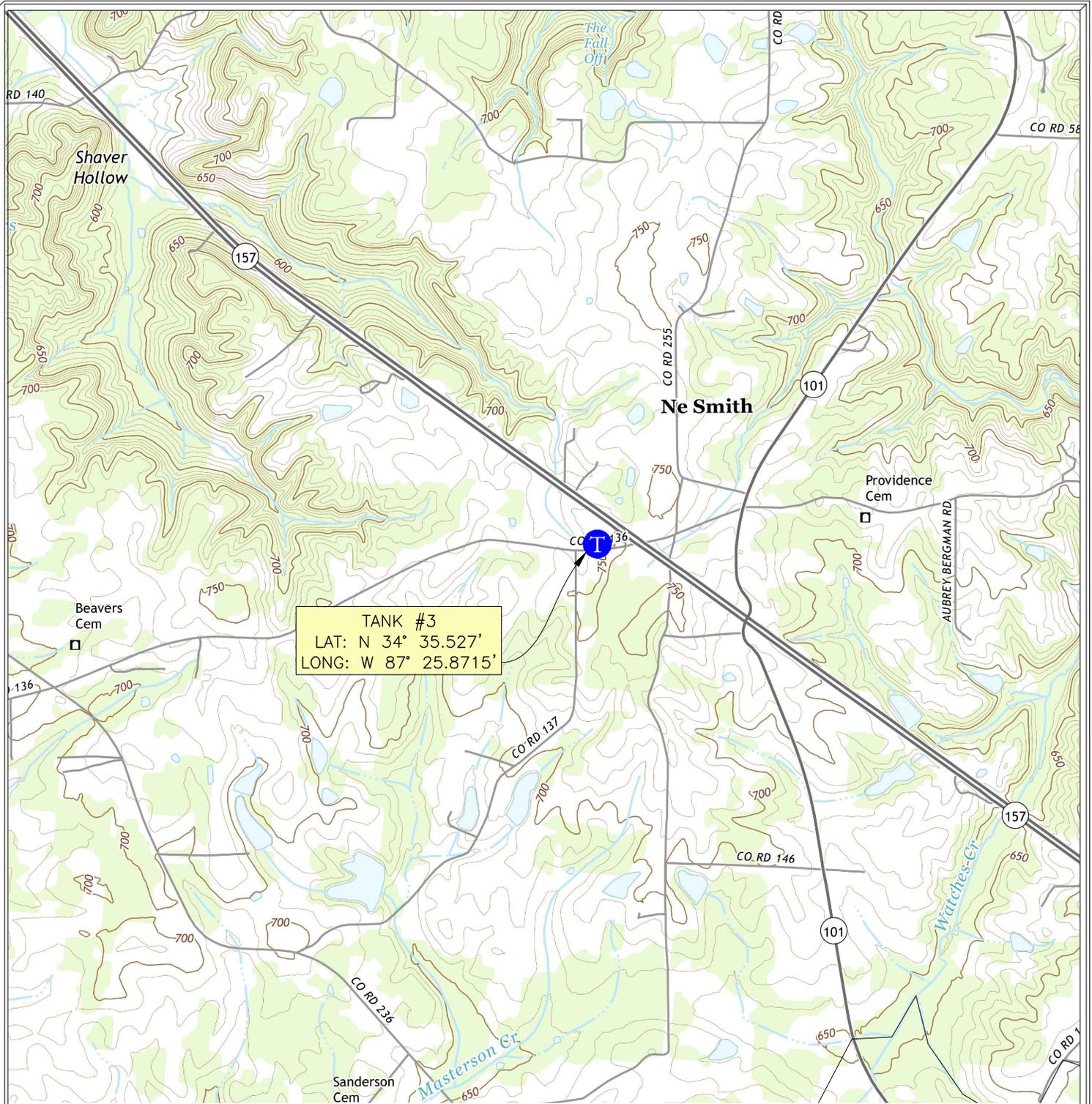
KG

THE KELLEY GROUP
 105 W 2nd Street
 Tuscumbia, Alabama 35674
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TANKS #1 & #2 QUAD MAP

**WATER SYSTEM IMPROVEMENTS
 WEST LAWRENCE WATER CO-OP
 ALABAMA**

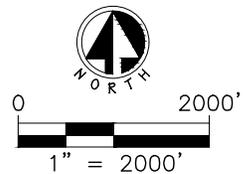
PROJECT NUMBER 190053	DATE 7/2020	SHEET NUMBER 2
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LEGEND

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USGS QUAD MAPS FOR MOULTON & MASTERSON MILL, LAWRENCE COUNTY, ALABAMA, 7.5 MINUTE SERIES, REVISED 2018. SCALED AT 1:24,000



THE KELLEY GROUP

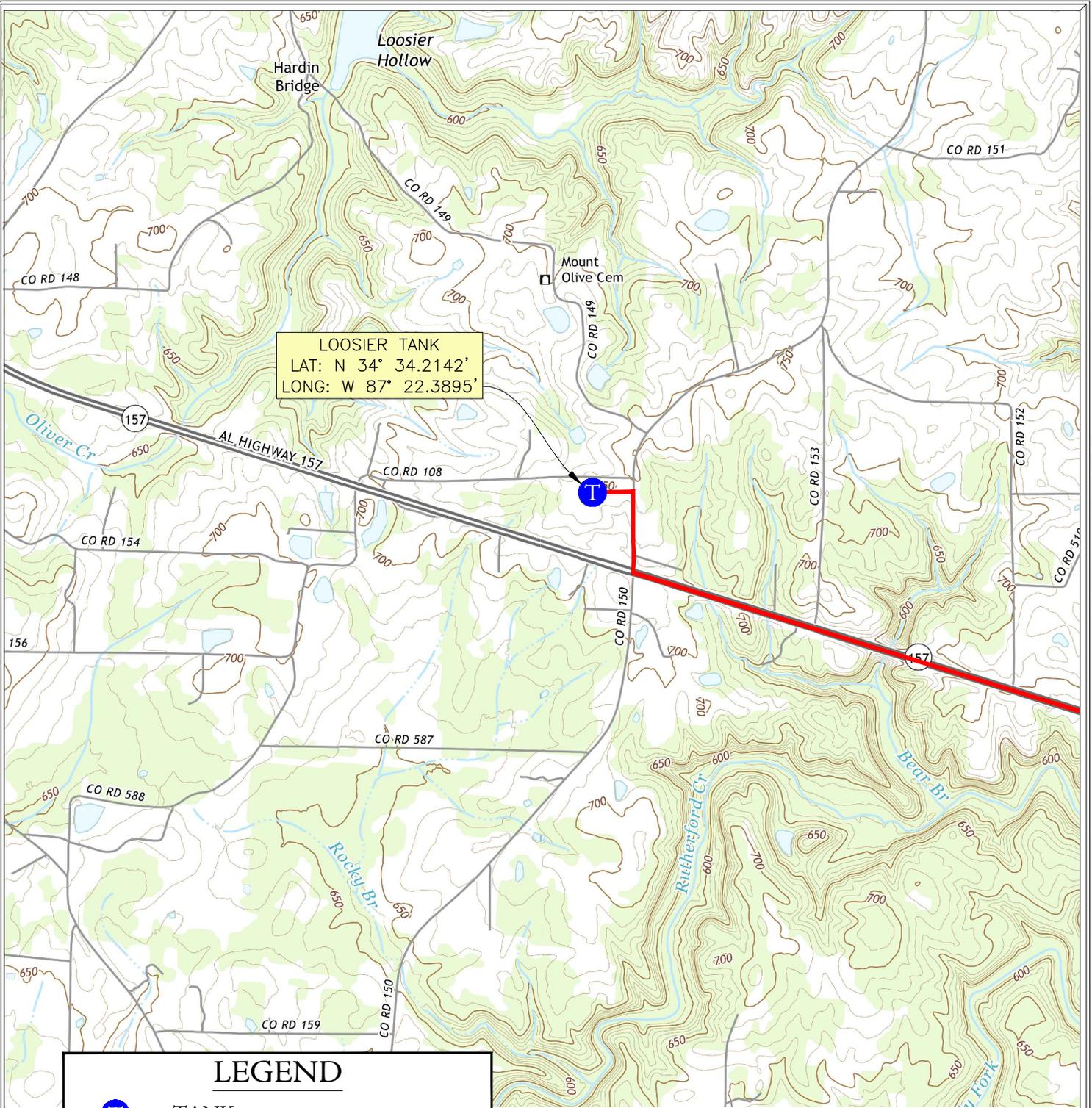
105 W 2nd Street
 Tuscumbia, Alabama 35674
 Phone: 256.248.7030 Fax: 1.866.225.7488

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TANK #3 QUAD MAP

**WATER SYSTEM IMPROVEMENTS
 WEST LAWRENCE WATER CO-OP
 ALABAMA**

PROJECT NUMBER 190053	DATE 7/2020	SHEET NUMBER 3
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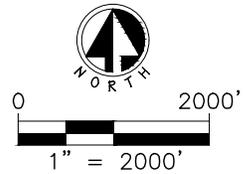


LOOSIER TANK
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LEGEND

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 WATER LINE IMPROVEMENTS



USGS QUAD MAPS FOR MOULTON & MASTERSON MILL, LAWRENCE COUNTY, ALABAMA, 7.5 MINUTE SERIES, REVISED 2018. SCALED AT 1:24,000



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105 W 2nd Street
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LOOSIER TANK QUAD MAP

WATER SYSTEM IMPROVEMENTS
 WEST LAWRENCE WATER CO-OP
 ALABAMA

PROJECT NUMBER 190053	DATE 7/2020	SHEET NUMBER 4
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